

Re: ET Docket No. 03-104

Dear Sir/Madam:

The FCC is considering the possibility of changes to Part 15 of its rules that would facilitate deployment of Broadband over Power Line ("BPL") technology throughout the United States. The FCC believes that such deployment would be in the public interest because it would provide consumers with more choices for Internet access and other high-speed data applications.

The California Amateur Radio Service (CARS) is in favor of increased competition. However, not when it means allowing an unlicensed service to interfere with a licensed service such as amateur radio. There is sufficient evidence in this proceeding to show that the BPL technology can generate harmful interference in the HF spectrum, including many of the frequencies assigned to amateur radio.

There is also the possibility that amateur radio signals will interfere with the BPL service. Just as the power lines can act as transmitting antennas radiating unwanted broadband signals, they can also act as sensitive receiving antennas picking up unwanted signals from the amateur radio service. Such signals could interrupt broadband Internet access to thousands of subscribers. This is one of the reasons the power line companies were opposed to the FCC granting certain frequencies in the 60 meter band to amateur radio (see QST Magazine, July 2003, p 68).

Part 15 is intended, among other things, to protect the amateur radio service from interference caused by unlicensed entities such as the BPL suppliers. The FCC has long recognized that the amateur radio service is a valuable resource. Therefore, compromising Part 15 rules as proposed in this proceeding would not be in the public interest.

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California Amateur Radio Service